## **brown**rudnick

ANTHONY J. BOCCAMAZZO direct dial: 860.509.6568 fax: 860.509.6655 aboccamazzo@brownrudnick.com

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## **VIA ECF**

Hon. Katharine H. Parker, U.S.M.J. Daniel P. Moynihan U.S. Courthouse 500 Pearl Street, Room 1950 New York, New York 10007

**RE:** Veerappan Subramanian v. Lupin, Inc. Civ. Action No. 17-5040-RA-KH

SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

07/16/2020

Dear Judge Parker:

Pursuant to your Honor's Rules, Defendant and Counterclaim Plaintiff Lupin, Inc. ("Lupin") requests that the Court accept under seal Lupin's opposition to the Sellers' July 10, 2020 motion to compel (the "Opposition"), as well as Exhibits A and B appended to the Opposition.

The Opposition and Exhibits A and B thereto make reference to certain confidential information with respect to settlement discussions of the Euticals Action, which has been redacted from the publicly filed version of the Opposition. The information redacted from the Opposition is of a kind that has not been historically open to the press and the general public, and, thus, should be filed under seal in accordance with the experience and logic test. *See Bernstein v. Bernstein Litowitz Berger & Grossman LLP*, 814 F.3d 132 (2d Cir. 2016).

Respectfully,

**BROWN RUDNICK LLP** 

/s/Anthony J. Boccamazzo
Anthony J. Boccamazzo